

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

U.S.A. FANTER CORPORATION, LTD., : CIVIL CASE NO. 1:20-CV-00003  
Plaintiff, :  
-v- :  
IMPERIAL PACIFIC INTERNATIONAL :  
(CNMI), LLC, :  
Defendant. :

MOTION FOR ORDER FOR PAYMENT OF ATTORNEY FEES

Receiver Clear Management, Ltd., hereby respectfully moves for an Order, authorizing and directing payment of its attorney's fees and costs, covering the period from December 13, 2022, to April 25, 2023, in the amount of \$4,834.20, payment to be made from the proceeds of the sale of Defendant's gaming equipment contained in the Escrow Trust Account of The Law Offices of Michael A. White, LLC. A copy of an invoice, dated April 29, 2023, is attached hereto in support of this Motion.

DATED: 01 MAY 2023

  
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MICHAEL A. WHITE, ESQ.  
Attorney for Clear Management, Ltd.

**Law Offices of Michael A. White, LLC.**

P.O. Box 5222 CHRB

Saipan, MP 96950

Phone: (670) 234-6547 Fax: (670) 234-9537

**INVOICE****Date:** 04/29/2023**Invoice #:** 12018**Bill To:**

Clear Management

Saipan, MP 96950

**Due Date:** 05/29/2023**Payment received after 4/29/2023 are not reflected in this statement.****Professional Services**

<b>Date</b>		<b>Details</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
12/13/2022	MAW	Prepare - Report & account of second auction & related pleadings	0.50	300.00	150.00
12/13/2022	MAW	Prepare - Email message	0.10	300.00	30.00
12/13/2022	MAW	Dictate - Motion for Disbursement of commissions, expenses, legal fees & related pleadings.	0.40	300.00	120.00
12/19/2022	MAW	Review - Email message correspondence re: Vehicles & Liquor	0.20	300.00	60.00
12/21/2022	MAW	Review - Motions	0.20	300.00	60.00
12/21/2022	MAW	Prepare - Exchange of email messages with Sam Salyer	0.20	300.00	60.00
12/29/2022	MAW	Prepare - Email message to Client	0.20	300.00	60.00
01/21/2023	MAW	Read - Email message from client Prepare - Email message to client	0.40	300.00	120.00
01/25/2023	MAW	Dictate - Report & account of 3rd auction, Motion & Notice of hearing	0.40	300.00	120.00
02/09/2023	MAW	Court Appearance - Motions for approval of sales on 2nd & 3rd auction; Disbursement of funds.	1.40	300.00	420.00
02/09/2023	MAW	Prepare - Email message to client	0.20	300.00	60.00
02/09/2023	MAW	Dictate - Order on 02/09/2023 hearing Prepare - Email messages to client	0.40	300.00	120.00

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02/13/2023	MAW	Casino Inspection tour	1.50	300.00	450.00
02/20/2023	MAW	Prepare - Email message to client re: Receipt of Auction funds	0.20	300.00	60.00
03/10/2023	MAW	Dictate - Motion for Authorization to pay commission on 2nd & 3rd sales, & related pleadings	0.30	300.00	90.00
03/22/2023	MAW	Review and Respond - to email messages from client. Dictate - Motion for Reimbursement of expenses and related pleadings	0.60	300.00	180.00
04/03/2023	MAW	Conference with clients thru Zoom meeting	0.20	300.00	60.00
04/06/2023	MAW	Court Apperance - Motion to approve commissions and expenses	1.00	300.00	300.00
04/06/2023	MAW	Dictate - Email message to client re: hearing Review - Minute	0.20	300.00	60.00
04/07/2023	MAW	Dictate - Proposed Order Authorizing payment of commissions and expenses	0.20	300.00	60.00
04/07/2023	MAW	Dictate - Proposed Order re: Expedited consideration of receiver's motion	0.40	300.00	120.00
04/07/2023	MAW	Prepare - Letters to attorneys for creditors requesting updated info on claims	1.00	300.00	300.00
04/07/2023	MAW	Dictate - letter to attorneys for creditors re: Possible expansion of receivership	0.50	300.00	150.00
04/12/2023	MAW	Prepare - Email message to client Prepare - Check to client for commissions and expenses	0.20	300.00	60.00
04/13/2023	MAW	Compile responses from IPI creditors re: Judgments and claims against IPI	0.50	300.00	150.00
04/14/2023	MAW	Dictate - Motion for Order approving 4th sale and disbursement of expenses	0.60	300.00	180.00
04/20/2023	MAW	Dictate - Report to District Court & Proposed Order	3.50	300.00	1050.00
04/24/2023	MAW	Prepare - Email message to client	0.10	300.00	30.00
04/24/2023	MAW	Review - Order amending procedure for approval of auction sales & disbursements Prepare - Email message to client	0.20	300.00	60.00
04/25/2023	MAW	Review - IPI's opposition to expansion of	0.10	300.00	30.00

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receivership

<b>For professional services rendered</b>	<b>15.90</b>	<b>\$4,770.00</b>
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<b>Additional</b>	<b>Charges</b>				
<b>Date</b>		<b>Details</b>	<b>Quantity</b>	<b>Rate</b>	<b>Amount</b>
12/13/2022	MAW	Filing Fees (online) re: Petition for Enforcement	1	20.50	20.50
01/03/2023	MAW	Photocopying charges	2	0.20	0.40
01/09/2023	MAW	PACER charges for December 2022	1	30.50	30.50
01/21/2023	MAW	Photocopying charges	8	0.20	1.60
01/26/2023	MAW	Cost of obtaining copy of 2021 Annual Corporation Report	1	5.00	5.00
02/09/2023	MAW	Photocopying charges	2	0.20	0.40
02/20/2023	MAW	Photocopying charges	4	0.20	0.80
03/23/2023	MAW	Photocopying charges	10	0.20	2.00
04/06/2023	MAW	Photocopying charges	2	0.20	0.40
04/14/2023	MAW	Photocopying charges	4	0.20	0.80
04/24/2023	MAW	Photocopying charges	2	0.20	0.40
04/25/2023	MAW	Photocopying charges	7	0.20	1.40
<b>Total additional charges</b>					<b>\$64.20</b>

<b>Invoice Amount</b>	<b>\$4,834.20</b>
<b>Payment Received</b>	<b>\$0.00</b>
<b>Remaining Balance</b>	<b>\$4,834.20</b>
<b>Previous Invoices Balance</b>	<b>\$0.00</b>
<b>Balance Due</b>	<b>\$4,834.20</b>